

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
SOUTHERN DIVISION**

CASA DE MARYLAND, INC., *et al.*

Plaintiffs,

v.

WOLF, *et al.*

Defendants.

Civil No. 20-2118-PX

JOINT MOTION TO EXTEND TIME TO FILE JOINT STATUS REPORT

The parties in the above-captioned case hereby jointly move this Court to extend their time to file a joint status report from March 1, 2021 to March 23, 2021.

1. Plaintiffs commenced the instant action pursuant to the Administrative Procedure Act, the Federal Vacancies Reform Act, and the Homeland Security Act, challenging the promulgation of two final rules issued by the U.S. Department of Homeland Security. (ECF No. 1). Plaintiffs moved for a preliminary injunction (“PI”), and by Order dated September 11, 2020, Plaintiffs’ motion was granted in part, and denied in part. (ECF Nos. 23, 69, 70).

2. Defendants filed an Interlocutory Notice of Appeal on November 10, 2020. (ECF No. 88). Plaintiffs filed a Cross-Appeal. (ECF No. 92). Defendants’ opening appellate brief is currently due on March 22, 2021.

3. The parties have twice requested that the case be held in abeyance for a limited duration. (ECF Nos. 91, 96).

4. On February 4, 2021, the Court, at the parties’ request, ordered the case to be held

in abeyance until February 22, on which date the parties would submit a joint status report. (ECF No. 97).

5. Upon the parties' request, in light of their continuing discussions related to Defendants' compliance with the Court's PI (ECF No. 98), the Court extended the deadline for the joint status report from February 22 to today. (ECF No. 99).

6. Plaintiffs respectfully request additional time to determine whether Defendants are adequately addressing their concerns related to Defendants' compliance with the Court's PI, such that the parties are amenable to jointly seeking another abeyance of this action.

7. Therefore, the parties request that their deadline to submit a joint status report be extended until March 23, 2021. An extension of the existing deadline will permit the parties to continue ongoing discussions related to compliance with the PI, and, if the deadline is extended, the joint status report will be due one day after the government's opening appellate brief is currently due.

8. The parties agree this request does not preclude Plaintiffs from seeking any relief from the Court as Plaintiffs deem appropriate.

9. Wherefore, the parties respectfully request that the time to submit a joint status report be extended from March 1, 2021 to March 23, 2021.

Dated: March 1, 2021

Respectfully submitted,

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